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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

DECLARATION OF A. CAMERON

Declaration of A. Cameron
Case No. 3:25-cv-03070-JD

DECLARATION OF AYANNA ASHAKI A. CAMERON

I, Ayanna Ashaki A. Cameron, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am the president and a dues-paying member of the Department of Justice (DOJ), Litigating Divisions, Local 3719, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME Local 3719” of the “Union”). AFSCME Local 3719 is affiliated with AFSCME District Council 20. District Council 20, through its constituent local unions like Local 3719, represents federal civilian employees in agencies and departments across the federal government. I rely on the Union and AFSCME to represent me as a member.

3. Both now and since before becoming the local union president, I have been employed by the DOJ, Civil Rights Division as an Equal Opportunity Specialist (EOS) in the Housing & Civil Enforcement Section. The DOJ’s mission is to uphold the rule of law, to keep our country safe, and to protect civil rights. As an EOS, I assist vulnerable people such as the elderly, victims of discrimination, and victims of sexual exploitation. For example, I investigate claims from U.S. citizens that were harmed by discriminatory acts on the basis of color, race, gender, religion or age. I also investigate claims of people that were forced to trade sexual acts to maintain housing for themselves and their family. I have been employed with the DOJ for 17 years and I am a veteran, having previously served for 13 years in the United States Army Reserve as a Staff Sergeant in JAG Reserve Unit.

4. AFSCME Local 3719 represents a collective bargaining unit of approximately 693 DOJ employees in the Office of the Solicitor General and Litigating Divisions. The local represents Professional Administrative Support Staff (PASS) employed by the Antitrust,

1 Civil Rights, Civil, Environment and Natural Resources, and the Tax Litigating Divisions in
2 Washington D.C. The local's bargaining unit members include Accessibility Specialists,
3 Administrative Specialists, Civil Rights Analysts, Community Outreach Specialists, Equal
4 Opportunity Specialists, Facilities Support Specialists, Financial Management Analysts,
5 Information Technology Specialists, Legal Administrative Specialists, and Paralegal
6 Specialists, and many more positions within the Litigating Divisions and the Office of the
7 Solicitor General. All the bargaining unit employees provide administrative, financial,
8 technical, and litigation support to trial teams, investigations, testing of discriminatory
9 practices, community outreach, compliance, and all matters necessary for litigation.
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11 5. AFSCME Local 3719 does not represent any employees in the DOJ's National
12 Security Litigating Division.
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14 6. AFSCME-represented employees at DOJ, including me personally, were offered
15 the "Deferred Resignation Program" (aka "Fork in the Road") by OPM in January 2025.

16 7. AFSCME Local 3719's mission is to represent the interests of the Litigating
17 Division employees and advocate for fairness in the workplace and better working
18 conditions. The local's core functions include providing support, guidance, and resources to
19 bargaining unit employees as their officially recognized exclusive representative. As the
20 exclusive representative for the nonsupervisory Litigating Division employees, AFSCME
21 Local 3719 enters into collective bargaining negotiations with the DOJ's Litigating Divisions
22 on a wide variety of terms and conditions of employment and represents bargaining unit
23 members through the negotiated grievance process. AFSCME Local 3719 and the Litigating
24 Divisions are parties to a collective bargaining agreement ("CBA") that memorializes
25 negotiated terms and conditions of employment, benefits, rules, a grievance procedure and
26 other procedures of the workplace. This agreement has been effective since 2002 and renews
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1 on an annual basis unless either party requests to bargain a new agreement.

2 8. The President's March 27, 2025 executive order (EO) titled *Exclusions from*
3 *Federal Labor-Management Relations Programs* will immediately harm AFSCME Local
4 3719's members, including me personally, because it prevents the union from performing its
5 core representative functions to accomplish its mission, and this harm will persist unless this
6 Court intervenes.

7
8 9. If the DOJ's Litigating Divisions employees lose their collective bargaining rights
9 under the Federal Service Labor-Management Relations Statute (FSLMRS) and AFSCME is
10 no longer the exclusive representative of these employees, the Union cannot enforce the
11 long-standing CBA in the workplace that facilitates labor-management relations and the
12 union's mission of advocating for fairness in the workplace.

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14 10. The Union funds its work on behalf of represented employees through voluntary
15 membership dues. If the EO is implemented and voluntary payroll deductions are prohibited,
16 it will severely harm the Union's ability to represent, support, and advocate for federal
17 workers.

18 11. The CBA sets important terms and conditions of employment for bargaining unit
19 employees. This includes establishing a negotiated grievance procedure to fairly resolve
20 disputes between bargaining unit employees and management; setting terms and conditions
21 for leave, hours of duty, performance appraisals, and overtime and compensatory time;
22 providing an alternate work schedule program; establishing professional development and
23 training standards; establishing health and safety standards; and providing commuter benefits
24 for the use of public transportation, among many other workplace protections and benefits.

25
26 12. Without collective bargaining rights under the FSLMRS, DOJ Litigating
27 Divisions employees will lose a labor-management relations framework they have been
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1 working under for over two decades, and the union will no longer be able to fulfill its
2 representational duties or enforce the CBA.

3 13. The CBA also provides for official time and Union use of facilities, which allow
4 me and other bargaining unit employees to carry out core representation duties during
5 business hours and on agency property without loss of pay or charge to annual leave. These
6 rights under the CBA are critical to AFSCME Local 3719's ability to administer the CBA,
7 collaborate with agency management to resolve problems or implement new initiatives,
8 advocate for workers in the grievance and arbitration process, and negotiate the CBA and its
9 mid-term amendments.
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11 14. If AFSCME is no longer the exclusive representative, it cannot represent all
12 bargaining unit employees in resolving workplace disputes with the DOJ through informal
13 meetings, formal meetings, or the negotiated grievance procedure up to and including
14 arbitration. This will have a chilling effect on workers raising concerns over their terms and
15 conditions of employment or about fairness in the workplace. This will lead to committed
16 and talented federal government employees leaving the federal service because of declining
17 terms and conditions of employment, and it will impair the mission of the DOJ to provide its
18 vital services.
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20 15. AFSCME Local 3719 bargaining unit members are very scared of losing their
21 collective bargaining rights under the FSLMRS. Our collective bargaining rights and union
22 representation have been crucial to protect our livelihoods and the mission of the DOJ to
23 uphold the rule of law. When we are able to do our jobs knowing that the Union is there to
24 ensure we are treated fairly, we can work without fear to make sure that DOJ makes our
25 country fairer for everyone. Without these protections—and especially now that we have
26 been targeted by the current Administration with the elimination of our collective bargaining
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1 rights at a time when AFSCME has been so active in its political advocacy—my fellow
2 Union members and I will have our speech chilled out of fear of retaliation, making it harder
3 for us to speak up at work to ensure the DOJ is operating as best it can for all Americans.

4 16. As a result of the March 27 Executive Order that targets federal unions and
5 workers because of our activity to oppose the Trump administration’s illegal actions, I am
6 hesitant and fear more repercussions by speaking up and advocating for workers in my role
7 as the president of AFSCME Local 3719. But without the union’s advocacy, workers will be
8 left without a voice in the workplace.
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11 I declare under penalty of perjury under the laws of the United States that the foregoing is true
12 and correct.
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15 Executed at Washington D.C. on the 4th day of April, 2025.

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17 _____
18 Ayanna Ashaki A. Cameron
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